



Privacy Policy

24 Our Care, LLC (the “Company”) provides monthly health care management services to health care providers’ patients over the telephone and via SMS/text messages. The Company is a party to a Business Associate Agreement with every single health care provider for which its services are provided to those health care providers’ patients. The Company’s employees work as clinical staff members of the health care provider for who’s patients are being telephoned or sent text messages, and in this connection, the Company is required to maintain the privacy and confidentiality of all patients with whom its employees speak to, including all protected health information (PHI), electronic protected health information (ePHI), and personally identifiable information (PII) that the Company’s employees learn or are made aware of when providing care management services to patients. The HIPAA Privacy Rule requires health plans and covered health care providers to develop and distribute a notice that provides a clear, user friendly explanation of individuals rights with respect to their privacy practices concerning their patients’ personal health information. Each medical provider that the Company contracts with to provide health care management services is legally required to give notice of their privacy practices, and each of the Company’s employees, whether working as a clinical staff member of the health care provider or as an officer, supervisor, or other employee of the Company, are all required to adhere to those policies. By law, all patients of every health care provider have specified rights to privacy concerning their healthcare information such as PHI, ePHI and PII. The following sets for how medical information about provider’s patients may be used and disclosed and how patients may obtain access to that information.

Patient Rights

All patients have the right to:

- Get a copy of their health and claims records
- Correct their health and claims records
- Request confidential communication
- Ask the Company to limit the information its personnel shares
- Get a list of those with whom the Company has shared a patient’s information
- Get a copy of this privacy notice
- Choose someone to act for them as an advocate
- File a complaint if a patient believes their privacy rights have been violated

Patient Choices

Patients have some choices in the way that their provider’s use and share information as their provider:

- Answers coverage questions from your family and friends
- Provide disaster relief
- Market services and sell patient information

Our Uses and Disclosures

The provider may use and share patient information to:

- Help manage the health care treatment they receive
- Run the provider’s organization
- Pay for the patient’s health services
- Administer the patient’s health plan
- Help with public health and safety issues
- Do research
- Comply with the law
- Respond to organ and tissue donation requests and work with a medical examiner or funeral director
- Address workers’ compensation, law enforcement, and other government requests
- Respond to lawsuits and legal actions

Patient Rights

When it comes to health information, all patients have certain rights. This section explains those rights and some of the medical providers’ responsibilities to help patients.

Get a copy of health and claims records

- A patient can ask to see or get a copy of their health and claims records and other health information that their provider has about them, and patients are openly encouraged to ask how to do this.
- The provider must provide a copy or a summary of a patient’s health and claims records, usually within 30 days of the request, and providers may charge a reasonable, cost-based fee for those records.

Ask a provider to correct health and claims records

- A patient can ask their provider to correct their health and claims records if they think the records are incorrect or incomplete and patients are openly encouraged to ask how to do this.
- A provider may say “no” to a patient’s request but must tell the patient why they answer was “no” in writing within 60 days.

Request confidential communications

- A patient can ask a provider to contact them in a specific way (for example, home or office phone) or to send mail to a different address.
- A provider must consider all reasonable requests and must say “yes” if a patient tells them they would be in danger if the provider will not share information.

Ask a provider to limit what is used or shared

- A patient may ask a provider to not use or share certain health information for treatment, payment, or the provider’s operations.
- A provider is not required to agree to a patient’s request and may say “no” if it would affect the patient’s care.

Get a list of those with whom a provider shared information

- A patient can ask for a list (accounting) of the times their provider shared their health information for six years prior to the date the patient asks, who the provider shared it with, and why.
- The provider must include all the disclosures except for those about treatment, payment, and health care operations, and certain other disclosures (such as any the patient asked the provider to make). Health care providers must provide one accounting a year for free but will charge a reasonable, cost-based fee if a patient asks for another one within 12 months.

Get a copy of this privacy notice

A patient can ask for a paper copy of the privacy notice at any time, even if a patient has agreed to receive the notice electronically. Each provider requested must provide the patient with a paper copy promptly.

Choose someone to act for the patient

- If a patient has given someone medical power of attorney or if someone is the patient’s legal guardian, that person can exercise rights and make choices about the patient’s health information.
- Providers must make sure the person has this authority and can act for the patient before taking any action.

File a complaint if the patient feel their rights are violated

- A patient can complain if they feel a provider has violated their rights by contacting the provider or the Company.
- A patient can file a complaint with the U.S. Department of Health and Human Services Office for Civil Rights by sending a letter to 200 Independence Avenue, S.W., Washington, D.C. 20201, calling 1-877-696-6775, or visiting www.hhs.gov/ocr/privacy/hipaa/complaints/.
- Providers cannot retaliate against a patient for filing a complaint.

Patient Choices

For certain health information, a patient can tell their provider their choices about what information is shared. If a patient has a clear preference for how the provider shares their information in the situations described below, they are encouraged to talk to their provider and tell them what they want the provider to do, and provider must follow those instructions.

In those cases, patients have both the right and choice to tell their provider to:

- Share information with their family, close friends, or others involved in payment for their care
- Share information in a disaster relief situation

If a patient is not able to tell a provider their preference, for example if the patient is unconscious, a provider may go ahead and share the patient’s information if the provider believes it is in the patient’s best interest. A provider may also share a patient’s information when needed to lessen a serious and imminent threat to health or safety.

In these cases, a provider must *never* share a patient’s information unless the patient provides written consent:

- Marketing purposes
- Sale of patient information
- Fundraising activities

Uses and Disclosures

How do medical providers typically use or share patient health information?

Medical providers typically use or share patient health information in the following ways:

Help manage the health care treatment received by a patient

A medical provider can use a patient's health information and share it with professionals who are treating the patient.

Example: A doctor sends a medical provider information about a patient's diagnosis and treatment plan so they can arrange additional services.

Operate the organization

- A medical provider can use and disclose patient information to run their organization and contact their patients when necessary.
- Medical providers are not allowed to use genetic information to decide whether they will give their patient coverage and the price of that coverage. This does not apply to long-term care plans.

Example: Providers use health information about patients to develop better services for them.

Pay for a patient's health services

A medical provider can use and disclose patient health information as the provider pays for the patient's health services.

Example: A provider shares information about a patient with their dental plan to coordinate payment for the patient's dental work.

Administer a patient's plan

A medical provider may disclose patient health information to their health plan sponsor for plan administration.

Example: A patient's employer contracts with the medical provider to provide a health plan, and the medical provider provides the employer with certain statistics to explain the premiums charged.

How else can a medical provider use or share patient health information?

Medical providers are allowed or required to share patient information in other ways – usually in ways that contribute to the public good, such as public health and research. Providers must meet many conditions in the law before they can share patient information for these purposes. For more information see: www.hhs.gov/ocr/privacy/hipaa/understanding/consumers/index.html.

Help with public health and safety issues

A medical provider can share health information about patients for certain situations such as:

- Preventing disease
- Helping with product recalls
- Reporting adverse reactions to medications
- Reporting suspected abuse, neglect, or domestic violence
- Preventing or reducing a serious threat to anyone's health or safety

Do research

A medical provider may use or share your information for health research.

Comply with the law

The Company will share information about a patient if state or federal laws require it, including with the Department of Health and Human Services if it wants to see that we're complying with federal privacy law.

Respond to organ and tissue donation requests and work with a medical examiner or funeral director

- A provider can share health information about a patient with organ procurement organizations.
- A provider can share health information with a coroner, medical examiner, or funeral director when an individual dies.

Address workers' compensation, law enforcement, and other government requests

A provider can use or share health information about patient:

- For workers' compensation claims
- For law enforcement purposes or with a law enforcement official
- With health oversight agencies for activities authorized by law
- For special government functions such as military, national security, and presidential protective services

Respond to lawsuits and legal actions

A provider can share health information about a patient in response to a court or administrative order, or in response to a subpoena.

Provider Responsibilities

- Medical providers are required by law to maintain the privacy and security of all patient protected health information.
- A provider must notify a patient promptly if a breach occurs that may have compromised the privacy or security of their information.
- A provider must follow the duties and privacy practices described in this notice and give a patient a copy of it.
- A provider may not use or share patient information other than as described here unless a patient states otherwise in writing. If a patient tells a provider it can, a patient may change their mind at any time by notifying the provider in writing.

For more information see: www.hhs.gov/ocr/privacy/hipaa/understanding/consumers/noticepp.html.

Changes to the Terms of this Notice

Providers can change the terms of the privacy notice, and the changes will apply to all information a provider has about its patients.

Other Instructions for Notice

- This Notice was last reviewed and revised in February 2024 by the Company's legal and compliance officer.